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**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**MADISON M. LARA, *et al.***

Plaintiffs

v.

**COL. ROBERT EVANCHICK,**

Commissioner of Pennsylvania

State Police

Defendant

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Civil Action No. 2:20-cv-01582

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**PROPOSED ORDER**

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AND NOW, on this \_\_\_\_ day of \_\_\_\_\_, 2020, upon the Motion Preliminary Injunction (the “Motion”) filed by Plaintiffs Madison M. Lara, Sophia Knepley, Logan D. Miller, Second Amendment Foundation, and Firearms Policy Coalition, Inc. (together, the “Plaintiffs”) against Defendant Colonel Robert Evanchick, Plaintiffs’ supporting Memorandum of Law and declarations and exhibits attached thereto, the Plaintiffs’ Complaint, and all other supporting materials, and Defendant’s opposition, if any, and having held a hearing on \_\_\_\_\_, 2020, the Court finds that Plaintiffs have established that:

1. There is a substantial likelihood that the Plaintiffs will succeed on the merits of their claims against the Defendant;
2. The Plaintiffs have and will continue to suffer immediate and irreparable harm if the Defendant’s unconstitutional conduct continues unabated;
3. The irreparable injury the Plaintiffs face outweighs the injury that the Defendant will sustain as a result of the immediate injunctive relief; and,

4. The public interest will be served by the granting of the immediate injunctive relief.

**WHEREFORE, IT IS HEREBY ORDERED THAT** the Plaintiffs' Motion for Preliminary Injunction is **GRANTED**, and the Defendant is hereby bound by the following terms:

1. Defendant Evanchick and his officers, agents, servants, employees, all persons in concert or participation with them, and all who have notice of the injunction, are **ENJOINED** from enforcing their laws, policies, and practices that prevent Plaintiffs, and those similarly situated between the ages of eighteen and twenty years-old, who are not disqualified from exercising their Second Amendment rights and wish to acquire a license under 18 Pa.C.S. § 6109 from applying for and being issued such a license.

2. Defendant Evanchick and his officers, agents, servants, employees, all persons in concert or participation with them, and all who have notice of the injunction, are **ENJOINED** enforcing 18 Pa.C.S. §§ 6106 and 6107 and their related regulations, policies, enforcement practices, and actions that individually and/or collectively prevent any individual between the ages of eighteen and twenty years-old, who are not disqualified from exercising their Second Amendment rights from carrying loaded, operable firearms, including handguns, on their person, in public and in their vehicles, for all lawful purposes including self-defense.

The Court further finds that no bond or other security shall be required of the Plaintiffs.

**SO ORDERED.**

**ENTERED** this \_\_\_\_\_ day of \_\_\_\_\_, 2020.

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, U.S.D.J.